

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ISMAEL MARRERO ROLÓN, et al.,

Plaintiffs,

v.

AUTORIDAD DE ENERGÍA ELÉCTRICA
a/k/a PUERTO RICO ELECTRIC
POWER AUTHORITY, et al.,

Defendants.

Civil No. 15-01167 (JAG)

CLASS ACTION

PREPA'S INITIAL DISCLOSURES

Pursuant to the provisions of Fed.R.Civ.P. 26(a)(1) and (2), defendant Puerto Rico Power Authority (PREPA), hereby makes the following initial disclosures. By making these disclosures, PREPA is not waving any objection or privilege to the disclosure, examination, production and/or the admissibility related to the content and/or subject matter of such disclosures.

I. NAME, ADDRESS, AND TELEPHONE NUMBER OF EACH INDIVIDUAL LIKELY TO HAVE DISCOVERABLE INFORMATION THAT DEFENDANT MAY USE TO SUPPORT ITS CLAIMS OR DEFENSES (FED.R.CIV.P. 26(a)(1)(A)(I))

Although PREPA is yet to determine which witnesses it will use at trial in order to support its claims/defenses in the present case, the following individuals are likely to have

discoverable information that the defendant may use to support its claims or defenses:

1. **Eng. Rafael Marrero-Carrasquillo:** PREPA's Director of the Environmental Division. He has personal knowledge of local and federal environmental laws, regulations and procedures within PREPA. Eng. Marrero also has personal knowledge of the requirements enforced by the Environmental Protection Agency ("EPA") upon PREPA as it relates to the fuels used by the corporation for the production of energy and the results of EPA monitoring.
2. **Lavinia Lebrón** - Chemist and Director of PREPA's Internal Laboratory. She has knowledge of the regulations and procedures related to the testing and analysis of Fuel and of the processes used in PREPA. Ms. Lebrón also has personal knowledge of many of the fuel tests conducted in PREPA's laboratory. As Director of PREPA's laboratory she is familiar with the internal fuel testing processes at PREPA and has personal knowledge of the local and federal laws and regulations related there to.
3. **Eng. Edwin Rodríguez** - Current Engineer and Manager of PREPA's Fuels Office. He has knowledge of the laws, regulations and procedures related to PREPA's Fuels Office. Eng. Rodríguez also has personal knowledge of the internal

processes regarding the purchase and use of fuel within PREPA for the time periods he has served in PREPA's Fuel Office.

4. **César Torres** - Executive Advisor to PREPA's Fuels Office.

He has knowledge of the laws, regulations and procedures related to PREPA's Fuels Office. Mr. Torres also has personal knowledge of the internal processes regarding the purchase and use of fuel within PREPA for the time periods he has served in PREPA's Fuel Office.

5. **William Clark** - Former Manager of PREPA's Fuels Office. He

has knowledge of the laws, regulations and procedures related to PREPA's Fuels Office. Mr. Clark also has personal knowledge of the internal processes regarding the purchase and use of fuel within PREPA for the time frame he was a PREPA employee at the Fuel Office.

The above stated individuals' address is: Individuals Edwin Rodríguez, Cesar Torres and William Clark are co-defendants in this case and can be contacted through their attorney of record. The rest of the individuals announced are current PREPA employees whose place of business is: 1110 Ponce de León Ave., Edif. NEOS PO Box 364267 San Juan, PR 00936-4267. They can be contacted through counsel for PREPA.

PREPA reserves the right to supplement this list as necessary during the investigation and discovery of this case.

II. COPY OF ALL DOCUMENTS THAT DEFENDANT MAY USE TO SUPPORT THE CLAIMS OR DEFENSES (FED.R.CIV.P. 26(a)(1)(A)(ii))

1. Monthly Fuel Quality Program Reports of 2002
2. Monthly Fuel Quality Program Reports of 2003
3. Monthly Fuel Quality Program Reports of 2004
4. Monthly Fuel Quality Program Reports of 2005
5. Monthly Fuel Quality Program Reports of 2006
6. Monthly Fuel Quality Program Reports of 2007
7. Monthly Fuel Quality Program Reports of 2008
8. Monthly Fuel Quality Program Reports of 2009
9. Monthly Fuel Quality Program Reports of 2010
10. Monthly Fuel Quality Program Reports of 2011
11. Monthly Fuel Quality Program Reports of 2012
12. Monthly Fuel Quality Program Reports of 2013
13. Monthly Fuel Quality Program Reports of 2014
14. Monthly Fuel Quality Program Reports of 2015
15. Original Consent Decree US v. PREPA 93-2527
16. Consent Decree Modification US v. PREPA 93-2527

17. Unsworn declaration under penalty of perjury from
Alving Tollinchi-Delgado of September 03, 2015. Dkt. 212-
4.

PREPA reserves the right to supplement this list as
necessary, during the investigation and discovery.

**III. COMPUTATION OF ANY CATEGORY OF DAMAGES CLAIMED BY DEFENDANT
(FED.R.CIV.P. 26(a) (1) (A) (iii))**

Not applicable.

**IV. INFORMATION RELATED TO ANY INSURANCE AGREEMENT THAT COULD
BE USED TO SATISFY PART OR ALL OF A JUDGMENT WHICH MAY BE
ENTERED IN THE ACTION (FED.R.CIV.P. 26(a) (1) (A) (iv))**

Not applicable

PREPA reserves the right to supplement these disclosures
pending further investigation and discovery procedures in
compliance with Rule 26 of the Federal Rules of Civil Procedure.

In San Juan, Puerto Rico, this 28th day of June, 2016.

s/Arturo Díaz-Angueira

Arturo Díaz-Angueira

s/Maraliz Vázquez-Marrero

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